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September 29, 2023,

Hon. Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Keita, et al. (Jailyn Hilliard)
22-cr-435 (LAP)

Dear Judge Preska:

I am counsel for Jailyn Hilliard, one of the defendants in the above-captioned case. The Court has scheduled a conference for October 3, 2023, at 11:00 a.m. I write to ask the Court to permit Ms. Hilliard and me to appear by videoconference. Because Ms. Hilliard resides in Little Rock, Arkansas, and she has full-time employment, requiring her to travel to New York would be expensive and disruptive.

This Court has the authority to permit Ms. Hilliard to appear remotely. See *United States v. Salim*, 690 F.3d 115, 121 (2d Cir. 2012) (In non-capital case a defendant may waive the right to be present as long as the waiver is knowing and voluntary). I have advised Ms. Hilliard that she has a right to appeal in person (and an obligation to do so unless excused by the Court). She understands that right and will waive it if the Court grants this request.

I have consulted with Assistant United States Attorney Jane Chong, and the government has no objection to this request.

Respectfully submitted,

SO ORDERED
Loretta A. Preska
LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE

_____/s/_____
Stephanie Carvlin

10/4/23